

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

MOBILEMEDIA IDEAS LLC,	)	
	)	
Plaintiff,	)	
v.	)	Civil Action No. 3:11-cv-02353-N
	)	
RESEARCH IN MOTION LIMITED and	)	JURY TRIAL DEMANDED
RESEARCH IN MOTION	)	
CORPORATION,	)	
	)	
Defendants.	)	
	)	

**MOBILEMEDIA IDEA LLC’S COMPUTATION OF DAMAGES  
PURSUANT TO THE JOINT PROPOSED SCHEDULING ORDER**

Pursuant to the Joint Proposed Scheduling Order filed on November 4, 2011 (D.E. 168), Plaintiff MobileMedia Ideas LLC (“MMI”) provides the following computation of damages.

Title 35 of the United States Code, section 284, provides that: “Upon finding for the claimant, the court shall award the claimant damages adequate to compensate for the infringement, but in no event less than a reasonable royalty for use made of the invention by the infringer, together with interest and costs as fixed by the court.” Accordingly, MMI seeks damages adequate to compensate MMI for the Defendants Research In Motion Limited’s and Research In Motion Corporation’s(collectively, “Defendants”) infringement, *i.e.*, no less than a reasonable royalty. MMI seeks pre-judgment interest as fixed by the Court, all other damages permitted by 35 U.S.C. § 284, including increased damages up to three times the amount of compensatory damages found, costs and reasonable attorneys’ fees incurred in this action as provided by 35 U.S.C. § 285.

Because the computation of damages depends on a number of factors, which are subject to ongoing fact and expert discovery, the complete computation cannot be provided at this time. Further, the computation of damages is expected to be the subject of expert testimony, which will be disclosed pursuant to the deadlines in the Joint Proposed Scheduling Order.

MMI's investigation concerning damages is continuing. In addition to the information provided above, MMI will provide supplementary information regarding a computation of damages and an identification of documents or other evidentiary materials on which such computation is based after damages-related discovery is made available by the Defendants, including in particular discovery related to Defendants' sales and profits.

MMI reserves the right to supplement this disclosure as fact and expert discovery progress.

Dated: March 2, 2012

Respectfully submitted,

/s/ Eric Pinker

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**CERTIFICATE OF SERVICE**

I hereby certify that, on March 2, 2012, a true and correct copy of the above document was filed through the CM/ECF system of the Northern District of Texas and was served by that system on all counsel of record.

/s/ Eric Pinker  
Eric W. Pinker